

Privacy Policy

Boundary Waters Capital LLC who has adopted this policy, believe in respecting the privacy and security of your personal information.

Please read this Privacy Policy carefully.

R.J. O'Brien & Associates, LLC, and its affiliates (collectively, "R.J. O'Brien" or "we" or "us") and your Introducing Broker (if applicable) believe in respecting the privacy and security of your personal information. The following Privacy Policy explains how R.J. O'Brien collects, uses, shares, and protects your personal information. Please read this Privacy Policy carefully.

We do not disclose any nonpublic personal information about our clients, or former clients, to anyone except as permitted by law.

Please note that other more specific policies may be applicable to you depending on where you are located. Please visit our Privacy Policy webpage at [https://www.rjobrien.com/Privacy- Policy.pdf](https://www.rjobrien.com/Privacy-Policy.pdf).

Collection of Personal Information

We collect your personally identifiable information ("PII") and other information directly from you and automatically or indirectly from you as a result of your relationship with us or use of and access to our services. PII includes any information by which you can be personally identified and may include your name, address, age, date of birth, electronic mail address, occupation, employment information, telephone number, education, the kind of service provided to you, credit card number, and other similar information.

We may use the PII collected from you to verify your identity and establish and maintain your account, among other reasons. This information also helps us improve our services to you, customize your browsing experience, and inform you about additional products, services, or promotions that may be of interest to you.

You directly provide us with the majority of PII we collect. We may also collect additional PII as required by law which includes information required to assess your experience and risk tolerance. Depending on our relationship, you provide us with this information by submitting an inquiry form, completing an account application and related documentation, by sending us an e-mail, or by submitting information in response an inquiry.

The information we collect indirectly from you includes information gathered through your interactions with our website. This information may include, Internet protocol ("IP") address, browser type, operating system, Internet service provider ("ISP"), and time stamps.

We, and our third-party service providers, use cookies to provide us with data we can use to improve your experience and to remember information that you have provided or choices you have made on the website, such as saving your logged-in status or site preferences. Cookies are small text files sent from Web servers that may be stored on your device. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We may link the information we store in Cookies to personally identifiable information you submit while on our site. Cookies do not contain account or password information.

Use and Disclosure of Your Information

We may use and/or share your information, including PII, for the following reasons:

- To contact you in response to your inquiries, comments, and suggestions;
- To contact you otherwise when necessary;
- For the specific purpose for which it was volunteered;
- To complete any transactions you may perform with or through us;
- To be provided to R.J. O'Brien's third parties in connection with the legitimate business purposes of R.J. O'Brien or the website;

- To third parties, including service providers, affiliates, and other outside organizations, that assist us with preparing and processing orders and statements;
- As required or permitted by law or regulation, or as requested by government authorities, or for the protection of persons or property; and
- In connection with an acquisition, merger, restructuring, sale, or other transfer involving all or any portion of the business.

Confidentiality and Security

We restrict access to your PII to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards to guard your PII. However, due to the design of the internet, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties. Furthermore, your individual broker may be provided your PII.

Accessing, Modifying, and Correcting Personal Information

We strive to maintain the accuracy of any personal information collected from you. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes. Please review all your information carefully before submitting it to us and notify us as soon as possible of any updates or corrections.

USA Patriot Act: Notice to Clients

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: when you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you.

Changes to this Privacy Policy

We reserve the right, at any time, to modify, alter, and/or update this Privacy Policy, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Policy. We will use reasonable efforts to notify you in the event material changes are made to this Privacy Policy, such as by posting a notice on the Services. Your continued use of the Services following our posting of any revised Privacy Policy will constitute your acknowledgement of the amended Privacy Policy.